January 21, 2003

RE: Truck Accessories Group, Inc. dba Leer Midwest

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

January 21, 2003

Mr. Charles Madison
Truck Accessories Group, Inc., dba Leer Midwest
58288 Ventura Drive
Elkhart, IN 46517

Re: 039-16620
Sixth Administrative Amendment to
Part 70 039-7561-00097

Dear Mr. Madison:

Truck Accesories Group, Inc. dba Leer Midwest, formerly known as J. B. Pointdexter and Company, Inc., d/b/a Leer, Inc., was issued a Part 70 permit on March 22, 1999, for a stationary source manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers. A letter requesting some changes was received on December 30, 2002. The changes requested are related to the relocation of one (1) chop booth from plant 1 to plant 2, and the addition of an insignificant activity to plant 1. The potential to emit of all pollutants from the chop booth are at exemption levels. According to 326 IAC 2-7-11(a)(7), an administrative amendment may be used for a modification that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strike-out~~ to show deletions and **bold** to show additions):

(a) Section A.2 is amended as follows:

Plant 1:

(1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.

(2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.

(3) ~~Two (2)~~ **One (1)** chop booth~~s~~ (**Plant 1** laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4~~, P1W1, P1W2, P1W3, P1W4~~.

Plant 2:

(9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.

(10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.

(11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

(12) One (1) chop booth (Plant 2 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 2, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1W1, P1W2, P1W3, P1W4.

(b) The description of Plant 1 insignificant activities in Section A.3 is amended as follows:

Other categories with emissions below significant thresholds:

(3) Two (2) gun clean-up stations utilizing solvent bowls for clean-up, **and one (1) solvent recovery unit identified as P1SR1 with a maximum capacity to reclaim 60 gallons of solvent per eight (8) hour shift, exhausting to stack P1SRV1.**

(c) Section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]
Plant 1:

(1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.

(2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.

(3) ~~Two (2)~~ **One (1)** chop booth~~s~~ (**Plant 1** laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4~~, P1W1, P1W2, P1W3, P1W4~~.

Other categories with emissions below significant thresholds:

(3) Two gun clean-up stations utilizing solvent bowls for clean-up, **and one (1) solvent recovery unit identified as P1SR1 with a maximum capacity to reclaim 60 gallons of solvent per eight (8) hour shift, exhausting to stack P1SRV1.**

(d) Section D.2 is amended as follows:

Plant 2:

(9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.

(10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.

(11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

(12) One (1) chop booth (Plant 2 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 2, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1W1, P1W2, P1W3, P1W4.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Truck Accessories Group, Inc., dba Leer Midwest
58288 Ventura Drive and 28858 Ventura Drive
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7561-00097	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 22, 1999

First Administrative Amendment No. 039-11649	Issuance Date: February 8, 2000
First Minor Source Modification No. 039- 10828	Issuance Date: January 24, 2001
First Minor Permit Modification No. 039-13586	Issuance Date: February 16, 2001
Second Administrative Amendment No. 039-14054	Issuance Date: May 1, 2001
Third Administrative Amendment No. 039-14936	Issuance Date: October 25, 2001
Fourth Administrative Amendment No. 039-15637	Issuance Date: April 25, 2002
Fifth Administrative Amendment No. 039-15966	Issuance Date: August 20, 2002

6th Administrative Amendment No.: 039-16620	Pages Modified: 5, 6, 6a, 7, 29, 32, 32a
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 21, 2003

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary emission source manufacturing and coating fiberglass reinforced pickup truck caps and tonneau covers.

Responsible Official:	Barry Sanson
Source Address:	Plant 1: 58288 Ventura Drive, Plant 2: 58360 Ventura Drive, and Plant 3: 28858 Ventura Drive, Elkhart, Indiana 46517
Mailing Address:	58288 Ventura Drive, Elkhart, Indiana 46517
SIC Code:	3792
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1:

(1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.

(2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.

(3) One (1) chop booth (Plant 1 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4.

(4) Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.

(5) One (1) hand wipe and HVLP final finish and liner insert operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour.

(6) Two (2) HVLP paint booths (prep. and paint process) and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions. Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.

(7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1DC.

(8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Plant 2:

(9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.

(10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.

(11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

(12) One (1) chop booth (Plant 2 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 2, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1W1, P1W2, P1W3, P1W4.

Plant 3:

(13) One (1) air-assisted airless laminating area and the associated cleanup operations, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.

(14) One (1) air-assisted airless gelcoating booth and the associated cleanup operations, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

(15) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.

(16) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Plant 1:

(1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

(3) Two (2) gun clean-up stations utilizing solvent bowls for clean-up, and one (1) solvent recovery unit identified as P1SR1 with a maximum capacity to reclaim 60 gallons of solvent per eight (8) hour shift, exhausting to stack P1SRV1.
(4) One (1) paint mix room, exhausting to stack identified as MIX1.
(5) One (1) mold repair area, to repair and clean mold surface for re-use.

Plant 2:

(6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(7) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

Other categories with emissions below significant thresholds:

(8) Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
(9) One (1) paint mix room, exhausting to stack identified as P2MR.
(10) One (1) barrel top adhesive mixer, maximum capacity 55 gallons.

Plant 3:

(11) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

All plants:

(12) Miscellaneous welding units.
(13) Compressors using blowdown for cleanup.
(14) One (1) large propane tank filling station with a capacity less than ten thousand five hundred (10,500) gallons and a throughput less than three thousand five hundred (3,500) gallons per day.
(15) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.

Other categories with emissions below significant thresholds:

(16) Miscellaneous lift trucks.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Plant 1:

(1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.

(2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.

(3) One (1) chop booth (Plant 1 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4.

(4) Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.

(5) One (1) hand wipe and HVLP final finish and liner insert operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour.

(6) Two (2) HVLP paint booths (prep. and paint process) and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks. Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.

(7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1DC.

(8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Insignificant Activities:

(1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

(3) Two gun clean-up stations utilizing solvent bowls for clean-up, and one (1) solvent recovery unit identified as P1SR1 with a maximum capacity to reclaim 60 gallons of solvent per eight (8) hour shift, exhausting to stack P1SRV1.
(4) One (1) paint mix room, exhausting to stack identified as MIX1.
(5) One (1) mold repair area, to repair and clean mold surface for re-use.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Plant 2:

(9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.

(10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.

(11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

(12) One (1) chop booth (Plant 2 laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 2, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1W1, P1W2, P1W3, P1W4.

Insignificant Activity:
(1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(2) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

Other categories with emissions below significant thresholds:

(3) Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
(4) One (1) paint mix room, exhausting to stack identified as P2MR.
(5) One (1) barrel top adhesive mixer, maximum capacity 55 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2]

Pursuant to CP No. 039-5284-00097, issued on July 21, 1996, the input volatile organic compounds delivered to the applicators of Booths B4, B5, and B6, including clean-up solvents shall be limited, in total, to 3.25 tons per month. Therefore 326 IAC 2-2 and 40 CFR 52.21 (PSD rules) does not apply.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP No. 039-5284-00097, issued on July 21, 1996, Booths B4, B5, B6, shall use Best Available Control Technology (BACT). The BACT determined for these facilities are:

(a) The use of High Volume Low Pressure (HVLP) application systems for Booths B5 and B6;

(b) Hand application method for Area B4;

(c) The HVLP applicators shall be used at all times during which Booths B5 and B6 are operated; and

(d) Hand applicators shall be used at all times during which Area B4 is operated.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or